

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Daniel Godlewski, Jr.)	
)	
Plaintiff,)	Case No.: 24-cv-415
)	
v.)	
)	JUDGE ELLIS
Village of Lyons Chief of Police Thomas)	
Herion,)	
)	
Defendant.)	
)	
)	

JOINT INITIAL STATUS REPORT

NOW COME the parties by their attorneys of record, and for their Joint Initial Status Report state as follows:

1. Nature of the Case
 - A. The attorneys of record are as follows:
 1. Plaintiff's attorneys are: Garrett Browne (lead attorney) and Ed Fox.
 2. Defendant's attorneys are: Mark H. Sterk (lead attorney) and Richard F. Bruen.
 - B. Plaintiff has asserted a claim that Defendant, in his individual capacity, caused Plaintiff to be seized without any legal cause in violation of his Fourth Amendment rights. No counterclaims or third-party claims have been asserted.
 - C. The major legal and factual issues in this case are expected to be whether there was any legal cause for the seizure of Plaintiff's person and the extent of any damages caused to Plaintiff.
 - D. Plaintiff is seeking to recover compensatory and punitive damages.

2. Jurisdiction

A. This Court has federal question jurisdiction. This action arises under the United States Constitution and the Civil Rights Act of 1871 (42 U.S.C. §1983).

Therefore, this court has jurisdiction pursuant to 28 U.S.C. §§ 1343 and 1331.

3. Status of service: Defenant has been served and his attorneys have filed appearances with the Court.

4. The parties do not unanimously consent to proceed before a Magistrate Judge.

5. Motions:

A. There are no pending motions.

B. Defendant anticipates responding to the complaint by filing an answer by April 11, 2024.

6. Case Plan:

A. The parties propose the following discovery plan:

(1) The parties will need discovery related the incident including discovery of any reports, electronic records, and video/audio recordings related to the incident. The parties will need to take depositions of any known witnesses.

(2) The parties will issue 26(a)(1) disclosures by: April 8, 2024.

(3) The parties will issue written discovery by: April 8, 2024.

(4) Fact discovery will be completed by: August 9, 2024.

(5) The parties do not anticipate any expert discovery.

B. Trial

(1) A jury demand has been filed.

(2) The probable length of trial is 2 to 3 days.

7. Status of Settlement Discussions:

- A. No settlement discussions have occurred;
- B. No settlement discussions are planned at this time;
- C. The parties do not request a settlement conference at this time

BY: s/Garrett Browne

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